

NEBRASKA VOLUNTEER SERVICE COMMISSION

2005-2006 AmeriCorps Sub-Grantees Program Monitoring Process

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I. OVERVIEW

The Nebraska Volunteer Service Commission ("NVSC") monitors sub-grantees ("programs") to ensure compliance with applicable federal, state, and Commission policies, and to evaluate the quality of the community service provided, and of the member experience while serving in AmeriCorps.

The NVSC staff is committed to communicating clear expectations to programs, providing timely guidance that focuses on both compliance and quality issues, and helping programs continuously improve their operations and impact. A "risk-based" monitoring approach helps NVSC staff monitor programs in an efficient and strategic way.

Risk Based Monitoring

The NVSC staff uses a variety of methods to monitor AmeriCorps programs. A risk-based approach determines the appropriate strategy for – and level of -- program monitoring that is needed for each program. In evaluating a program's risk level, the following factors will be considered:

- Experience as a subgrantee
- Experience in managing federal or state awards
- Monitoring/Compliance issues
- Size and/or complexity of grant
- History as related to meeting performance measures / objectives
- A-133 Audit findings
- Staff tenure
- Agency infrastructure and support
- Prior site visits and findings
- Adequacy and timeliness of program and financial reports
- Responsiveness to NVSC staff
- Member retention and enrollment rates
- Communication with NVSC, including participation in training events

A program's risk assessment – conducted jointly by NVSC Program and Fiscal Officers – is conducted just prior to the start of the grant year (as a component of the “Pre-Award” monitoring procedures) and at least quarterly thereafter. The numerical assessment of the above risk factors will categorize programs into one of three risk levels: High Risk, Medium Risk, or Low Risk. The table below serves as a basic guide for Program Monitoring based on risk.

RISK-BASED MONITORING			
	Low Risk	Medium Risk	High Risk
Progress Reports	QUARTERLY	QUARTERLY	QUARTERLY
Fiscal Reports	QUARTERLY	QUARTERLY	QUARTERLY
Pre-award Document Review (including A-133 Audit)*	X*	X	X
Pre-award Risk Assessment	X	X	X
SITE VISIT: Fiscal Director Interview	As needed	1	2
SITE VISIT: Fiscal File Sampling		1	2
SITE VISIT: Program Director Interview	As needed	1	2
SITE VISIT: Member File Sampling	100%	100%	100%
SITE VISIT: Member Focus Group		1	2
SITE VISIT: Operating Site Interview	As needed	X	X
SITE VISIT: Commissioner Visit	as requested by Commissioners	as requested by Commissioners	as requested by Commissioners
SITE VISIT: Program Follow-up Visit	As needed	As needed	X
DESK AUDIT: Programmatic Sample	X	X	X
DESK AUDIT: Fiscal Review	X	X	X
DESK AUDIT: Fiscal File Sampling	X	X	X
DESK AUDIT: Electronic Member Survey	X	X	X
TA Sessions	as needed	Biannually, at minimum	Quarterly on site

**Reduced review for low-risk programs.*

Note: The NVSC may alter a program's monitoring strategy if a staff member with oversight responsibility deems additional oversight to be necessary. For example, if a low risk program hires a new program director, the program officer may decide to do an on site program director interview in addition to a programmatic desk review.

II NVSC OVERSIGHT STAFF

Each program is assigned an NVSC Program Officer, who serves as the primary liaison between the NVSC and the respective programs:

Gale Jungemann-Schulz (402) 471-6249 or
gale.jungemannschulz@hhss.ne.gov

All Programs

The Program Officer is responsible for programmatic oversight and ensuring adherence to AmeriCorps Provisions, federal regulations, state law, and NVSC policies and expectations. To this end, program officers monitor member service, progress towards outcomes, and use of AmeriCorps funds. Program Officers also provide technical assistance and mentorship to program staff, and work with programs towards continuous improvement and program excellence.

The Program Director is expected to contact his/her NVSC Program Officer with program questions and concerns. On-going communications include regular contact by phone, e-mail, in person and by standard mail. Copies of e-mail messages and letters are kept in the appropriate program's correspondence file for the relevant program year.

All programs will also communicate with the NVSC Fiscal Officer, who serves as primary liaison between subgrantees (programs), the Commission, and its fiscal agent – State of Nebraska HHSS Accounting:

Janet Schmidt/ 402-471-6225 / nvsc@hhss.ne.gov
All programs

The Fiscal Officer similarly provides fiscal oversight to ensure proper stewardship of federal funds, as outlined by federal Provisions, regulations, state law, and NVSC policy. The Fiscal Officer also provides technical assistance to program fiscal directors, conducts fiscal site visits and desk audits, monitors program expenditures and match claims through Financial Status Reports (FSRs) and reimbursement requests (PERs), prepares program reimbursements, and facilitates grant closeouts. In general, The Commission Fiscal Officer should be the primary Commission contact for fiscal management issues.

III. PRE-AWARD MONITORING

Prior to the Grant Review process, the NVSC will take the following steps to assess applicants' capacity to manage AmeriCorps programs:

All new applicant agencies will complete and submit a "Financial Assessment Survey" prior to the Peer Review Process. The survey will measure the degree of financial risk that could be incurred by the Commission. Additionally, the NVSC Program Officer will complete an "Organizational Risk Assessment" to gauge risk as outlined in Part I.

Resubmitting program risk will be similarly assessed using a standard "risk assessment" that takes into account the performance of the program to date. Recurring issues and compliance citings are included in this report, which is prepared by the Program Officer.

These assessments will be factored into the scoring process during both the peer and Program Committee grant reviews.

After funding recommendations have been made to CNCS, the Program Officer will take the following actions to ensure that programs are adequately prepared for the grant year:

1. **Document Review:** The Program Officer will analyze all documents that are vital for successful program administration. Feedback will be sent to the Program Director; changes may be required prior to the grant period start date. The document review focuses on proactive member and site monitoring systems, and quantitative data collection systems. These may include, but are not limited to:
 - Member Contract – with an emphasis on grievance procedures, and the integration of AmeriCorps and programmatic requirements into the document
 - Program performance measurements and tools
 - Member & staff timesheets
 - Financial documents, such as in-kind tracking logs
 - Host site agreements
 - Member Position descriptions
2. **Distribution of current Commission policies:** Official Commission-approved policies will be distributed along with the Cooperative Agreements for the year . As policy changes occur, the Program Officer will send updates to all Program Directors via the “americorpsnebraska” listserv and post the updated policies on WBRs.
3. **Distribution of requirements:** Within the Cooperative Agreement and the Program Director’s Orientation, all requirements and expectations of programs will be defined. Fiscal and Programmatic Reporting deadlines, site visit requirements, and closeout procedures, etc. are all relayed to programs within the first weeks of the program.
4. **Pre-award training:** Program directors, fiscal directors, and site supervisors will be required to attend a training prior to the start of the grant year that will provide technical assistance focused on start up issues and requirements of AmeriCorps.
5. **Pre-award meeting:** at least one meeting will be scheduled prior to, or coinciding with, the program start date. This informal meeting of the program staff and Commission Program Officer will focus on clarification of start-up issues, resolving any outstanding fiscal and/or programmatic issues from previous grant periods, and assessing the degree of technical assistance that the program may require during the year.
6. **Register programs on the Program Director listserv:** All Commission information is distributed to Program Directors via the “americorpsnebraska” listserv. By registering on the listserv, directors will have access to Commission calendars, policies, document templates, and archived messages.

IV ONGOING MONITORING

a. WBRs Reporting

WBRs is the central clearinghouse for all vital program information. The NVSC Oversight Staff monitors programs on a continuous basis to determine member recruitment and retention, service activity and outcomes, and adherence to both fiscal and programmatic commitments. The NVSC Program Officer will monitor the following:

Report deadlines: programs are required to enter reports (coinciding with calendar quarters) by deadlines specified in current Cooperative Agreements.

Member Information: All member information (commitments, enrollments, change of status, and exits) is required on WBRS within 30 days of the event.

Member Hours: all member hours (time logs) MUST be up-to-date for the period of any corresponding PER that is submitted. On the 20th day of each month (or each quarter, if the program has so specified in the Cooperative Agreement), program payment will be issued, if the Program Officer certifies that all member hours are current in WBRS.

Progress Reports: Programs will receive feedback on each Progress Reports (APRs) and the initial APR maps from the Program Officer. (See APR Feedback Procedure). Feedback may require corrective action by the program.

The Fiscal Officer will monitor:

Fiscal Reports: Programs may also may be sent feedback about their PER or Income Reports (See PER Processing Procedure) by the Fiscal Officer.

Generally, program payment may be delayed or withheld if:

- Match looks insufficient
- Calculations are incorrect,
- Variations from the original budget total more than 10% of the total grant amount, or
- An expenditure appears non-allowable and requires investigation
- The member living allowance amount claimed is in excess of maximum federal share (85%) or in excess of the maximum amount of federal funds which can be reimbursed to the program for member living allowances

Program payment WILL be withheld, according to Commissioner-approved policy, if a program is considered non-compliant. (See Policy for Reimbursing Funds to Sub-Grantees, Revised 03/17/05)

b. Program correspondence

Throughout the entire period, the Program Officer will document all meetings and correspondence with programs. Telephone conversations will be recorded in a weekly log, and substantive emails will be archived. Issues raised in such correspondence may be considered in future funding decisions, and/or addressed in-depth during site visits.

If such correspondence evidences areas of risk or non-compliance, the Program Officer may send or fax an official 'guidance memo,' outlining deadlines for the program to take corrective actions.

c. Site Visits

(per the draft 2005-2006 Cooperative Agreement):

"Commissioners and Commission Staff will make site visits to programs for the purpose of building communication, providing technical assistance, and monitoring the program. Formal site visits will be scheduled at a mutually agreed upon time, and will happen at least once per year. The Commission may request additional visits. In this case, the program will be notified in writing why the additional site visits are warranted."

The program agrees that the Commission will have access at any time and the right to examine, audit, and copy on the program's premises any directly pertinent records and computer files involving transactions relating to this Agreement.

At minimum, the following records must be filed and easily accessed:

- **Complete member files**
 - Documentation of staff and members' time
 - Documentation of all equipment, materials, supplies, and travel expenses,
 - Documentation of in-kind contributions
 - Rationale and documentation of any indirect costs, and
 - Any other records which support charges to project funds"
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SCHEDULED SITE VISIT PROCEDURES

ON-SITE MONITORING VISITS

On-site visits are the most comprehensive monitoring that the Commission conducts. Although site visits are primarily used to assess program compliance status, they also serve as the best way to assess the quality of programming and to address continual improvement issues. Site visits will be conducted by the Program Officer, who may be accompanied by: the NVSC Fiscal Officer, Executive Director, PDAT Officer, or Commissioners.

The following is a chronological sketch of the initial monitoring visit:

Before the Visit:

- Two weeks in advance of the agreed visit date, the Program Officer sends the Program Director and Financial Director (if applicable) a pre-visit letter informing him/her of the monitoring visit process. The pre-visit letter includes a tentative site visit agenda, a Document Request / Checklist, and copies of the tools that will be used in the Site Visit.
- The Program Director to make sure that the appropriate program staff and/or members are available and to determine the order of visit's components.
- The Program Officer will conduct the Pre-Visit Assessment, which is largely a summary of all compliance / risk concerns to date. All communications thus far with the program will be factored into this assessment. Any findings of the Pre-Visit Assessment will be incorporated into the site visit agenda.
- The Program Officer gathers any relevant documents for the visit, such as the results of the Pre-Visit Assessment, documents which require revision, any previous feedback reports and program responses, or WBRS member rosters, and member hour tables.

During the Visit:

The site visit will include any of the following components (described below), based on the program's risk assessment:

1. Program Director Interview
2. **Member File Review (100% Review for all programs)**

3. Member Focus Group
4. Site Supervisor Interview
5. Commissioner Visit
6. Fiscal Director Interview
7. Fiscal File Sampling

- **Program Director's Interview:** conducted by the Program Officer, this interview serves as a follow up on any outstanding issues or compliance citations. This interview is also a comprehensive check to ascertain Provisional compliance.
- **Member File Sampling:** All member files for the program will be reviewed to ensure compliance with required documentation. Member files will be reviewed later in the year to ensure compliance with mid-term evaluations. Member files from the previous year will be reviewed to ensure compliance with end-of-term evaluations and exit documentation. Each file's contents are documented on the "NVSC Member File Sample Form" along with the member's demographic data. Program Officers may request hard copies of any or all files reviewed.
- **Member Focus Group:** The Program Officer facilitates a member focus group, with the intent of involving at least three, and no more than ten, members. No program staff members are present. The questions and responses are recorded on the Member Focus Group form. Member responses are kept confidential unless a member raises an issue that needs the immediate attention of the Program Director (e.g., members are participating in prohibited activities). Program Directors are encouraged to issue an open invitation for participation to members, though some directors of smaller programs may invite the entire team, or particular members.
- **Site Supervisor Interview:** At multi-site programs or those that operate with intermediaries, the Program Officer conducts a visit to at least one operating site (randomly selected) and will interview the site supervisor and the member, if applicable. The interviews are documented on standardized interview forms.
- **Commissioner Visit:** Commissioners are always welcomed to accompany an NVSC Staff member to visit a program. Unlike the NVSC staff visit which is largely focused on compliance (though Commissioners may assist with this focus), this less-structured facet of the visit may focus on areas for improvement or future planning, or to address recurring program difficulties. The Commissioner's feedback and assessment of the program will be incorporated into the NVSC Staff Feedback Letter.
- **Financial Director's Interview:** Conducted by the Fiscal Officer, this interview assesses the fiscal management of the program by examining:
 - Fiscal policies and procedures
 - a detailed general ledger/expenditure report,
 - random sample of member and staff payroll and corresponding time sheets,
 - random sample of source documentation for expenditures and match contribution.

Findings in the subgrantee's audit report will also be discussed during the interview, if appropriate.
- **Fiscal File Sampling:** Conducted by the Fiscal Officer, this assessment reviews the program's general ledger/expenditure report. Random samples of up to ten fiscal transactions from the general ledger/expenditure report are examined to ensure that:

- Grant expenditures correspond directly to a line item in the budget.
- Transactions adhere to program procurement and cost allocation procedures.
- Transactions demonstrate segregation of duties within the organization.
- Receipts or disbursements are clearly attributable to the grant and are allowable costs.
- Member living allowances claimed for reimbursement are within the maximum federal share (85%) and are within the maximum amount of the total member living allowance available to the program.

After the Visit:

- Within three weeks of the site visit date, the Program Officer sends a detailed site visit feedback letter to the Program Director. This feedback includes a list of all compliance issues identified during the visit that require corrective action, and risk management issues which may also require corrective action. The compliance assessment is accompanied by general feedback from the Program Officer, a summary of the Commissioner visit, and attachments of tools used to determine Compliance Statuses, such as the Member File Sampling Summary form, or Member Interview Summary.
- The program is expected to respond in writing to the feedback -- generally within four weeks (or 30 days) of receipt of the documents. Written response typically includes the corrective actions the program will take, or has taken to reach compliance.
- Once the Commission has received the program's written response, the Program Officer will log the date it arrived, and ascertain the new compliance status of the program. Confirmation of the program's compliance status, or a request for further information will be sent in writing (e-mail or via letter) from the Commission's Executive Director.

DESK AUDITS:

Desk audits visits may be used to follow-up on issues that were discovered in the on-site visit, as the primary oversight tool for very low-risk programs, or to serve as "spot checks" to ensure that proper program documentation is retained at subgrantee sites.

Desk Audits will be facilitated by the Program Officer, with the help of the NVSC Fiscal Officer. These audits are conducted over the phone.

Before the Desk Audit:

A week in advance of the desk audit, the NVSC Staff will send a general list of the areas that will require sampling (i.e. Member files or match documentation).

During the Desk Audit:

The Program Director will request that a list of documents be faxed to the NVSC Office by the business day's close. The desk audit will include any of the following components (described below), based on the program's risk assessment:

1. Programmatic Document Sample
 2. Fiscal Systems Review
 3. Fiscal File Sampling
 4. Electronic Member Surveys
- **Programmatic Documents** that may be sampled include
 - Member Citizenship IDs
 - Member Time Sheets
 - Training Agendas
 - Signed Grievance Procedures
 - **Fiscal Systems Review** may require samples of:
 - Financial Policies and Procedures Manual
 - Program Staff Segregation of Duties Checklist
 - Employee/Staff Manual
 - Cost Allocation Plan & Approval Letter from largest funding source
 - Blank and completed Staff Time Sheet
 - Copy of the General Ledger/Expenditure Report with account code key (Last 6 months or from start of program)
 - Match Documentation Procedures/Forms
 - **Fiscal Files** that will be sampled may include:
 - Copies of receipts, invoices and/or source documents for expenditures
 - Copies of member and staff payroll and corresponding timesheets
 - Match documentation/forms
 - **Electronic Member Surveys:** The Program Officer will select a random sample of members who will be sent a standard survey via email. Survey questions mainly address Provisional compliance, but also gauges continuous improvement issues such as "esprit de corps," member efficacy, and quality of service projects.

Member responses are anonymous and confidential. Trends only are reported back to the Program Director, along with any member responses that may indicate potential non-compliance. The process of follow-up to any such statements is the prerogative of the Program, however.

V. COMPLIANCE STATUS & IMPACT ON PROGRAMS

(From the 2005-2006 Cooperative Agreement):

Official site visits, informal visits, and ongoing monitoring might reveal areas of non-compliance, areas for improvement, or areas of "risk." As a result, the Commission may determine program status to be:

"Non-compliant," "Compliance Pending," or "Compliant."

If a subgrantee demonstrates non-compliance in relation to AmeriCorps Provisions, or does not remedy pending compliance issues or areas of risk by due dates specified by the Commission, future funding and/or pending requests may be withheld until all issues are adequately addressed.*

***Areas of risk,” although not issues of non-compliance, must be corrected by the program to fulfill the Commission’s risk-based monitoring strategy, and to ensure full compliance in future reviews. “Areas of risk” as defined by the NVSC AmeriCorps Sub-Grantees Program Monitoring Process, can include, but are not limited to:*

- *Sub-standard member retention rates (below 85%)*
- *Lack of responsiveness to NVSC staff*
- *Program staff turnover*
- *Adequacy and timeliness of reports*
- *Limited fiscal deficiencies*
- *Inability to demonstrate progress towards program objectives*
- *The severity or chronic nature of deficiencies discussed during the pre-award assessment period, or during site visits*
- *Issues discussed during email or phone correspondence with the program – including all items relating to program policies*

From the NVSC’s “Policy on Non-Compliance”:

“Issues of non-compliance will generally require corrective action by the program within two weeks. Programmatic deficiencies will have a longer timeframe to be addressed; however, if a deficiency is not addressed by the deadline indicated in the site visit feedback letter, the program will be considered non-compliant.”

“Programs must respond to the site visit feedback letter, by the required date specified in the letter, indicating compliance with the issues listed. If the necessary actions have not been taken, the Commission may withhold future funding, including any pending requests, until all issues are addressed.”

Any non-compliant program is in a position to lose current funding, to have reimbursements delayed, or to have the program eliminated. As previously stated, all compliance issues will be considered cumulatively as grants are reviewed in the “resubmit” process.”

When serious or chronic program issues arise, the NVSC Executive Director and/or members of the Commission may become involved in the resolution process and determine appropriate repercussions.

VI. RESOURCES FOR PROGRAMS:

To assist programs in efforts to be fully compliant and effective, the NVSC offers the following types of assistance:

Pre-Award Training: All program directors and, as appropriate, fiscal directors and site supervisors will attend a pre-award training that will ensure that programs understand member file requirements and start-up issues prior to enrolling members.

Program Director Orientations: All new Program Directors are required to participate in an informal “new Program Directors’ orientation” at the Program Year Kick Off event.

Topics include the basics on how to manage an AmeriCorps program, compliance with AmeriCorps Provisions, member recruitment/retention, and reporting requirements. The first objective of an orientation is to communicate to Program Directors what is required and expected.

Peer Network: All Program staff are registered on the “[americorpsnebraska](#)” listserv and are encouraged to submit questions and comments to the group, where it will be archived electronically. Additionally, the Commission seeks to establish peer exchanges or mentorships for program staff as needed.

Special Statewide Training Sessions: the NVSC also provides program staff with training related to relevant topics. The CNCS and/or NVSC staff select training topics using a PDAT “needs assessment” model (see below). The Commission may deem participation in some training events mandatory. In 2004-2005, mandatory trainings included:

- AmeriCorps 2004-2005 “KickOff”
- The Governor’s Conference on Community Service,
- Program conference calls as needed
- End-of-Year Reflection

Examples of additional training sessions that may be offered on an “as-needed” basis include: sustainability, WBRS, E-grants and member recruitment.

Program Development & Training (PDAT)

The PDAT officer facilitates or arranges training based on various assessments, including formal needs assessments, training evaluations, input from Commission staff, risk assessments, and direct requests from program staff and members. Programs that wish to request training should contact the Commission office

/ 402-471-6225 / nvsc@hhss.ne.gov
All Programs

Arranged training may include:

- monitoring site visits,
- scheduled meetings with staff, Commissioners, or field “experts”
- phone calls,
- e-mail messages,
- information posted on the listserv,
- referrals to CNCS contracted TA providers,
- peer exchanges with state or national programs
- facilitating participation in CNCS-sponsored trainings

Because training for members and operating site staff is required by AmeriCorps Provisions, not attending to these trainings may affect a program’s compliance status. The PDAT officer is responsible for training oversight, including monitoring program training plans and following up on any compliance or risk issues noted by Program or Fiscal Officers that relate to training/development. Areas of risk associated with training include, but are not limited to:

- Insufficient member orientation (as outlined by Provisions)
- Lack of “esprit de corps” among operating sites
- Substandard staff training, or
- Compliance concerns that may have resulted from lack of training

Any of these factors may ultimately affect a program’s compliance status, as jointly determined by PDAT and Program Officers.

Additional Funds Available

“Discretionary funds”: The PDAT Officer manages this CNCS grant, which provides funds for program staff or member training upon request (See Commission PDAT Policy). The PDAT officer establishes policy and procedures for ensuring an equitable distribution of these additional funds to support development and training initiatives. These funds fluctuate and may not be available every year.

“Disability funds.” The PDAT officer also manages this CNCS grant, which is available to assist programs to comply with Section 504 of the Rehabilitation Act and the ADA [Americans with Disabilities Act] requirements (for inclusion & accommodation of people with disabilities).